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Attorneys for Defendant
Raj Abhyanker

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NEXTDOOR.COM, INC., a Delaware
corporation,

Plaintiff,

vs.

RAJ ABHYANKER, an individual,

Defendant.

Case No. 3:12-cv-05667-EMC

**DEFENDANT AND
COUNTERCLAIMANT RAJ
ABHYANKER NOTICE OF CONSENTED
EXTENSION TO FILE MOTION FOR
LEAVE**

Judge: Honorable Edward M. Chen

RAJ ABHYANKER, an individual

Counterclaimant,

vs.

NEXTDOOR.COM, INC., a Delaware
corporation; PRAKASH
JANAKIRAMAN, an individual;
BENCHMARK CAPITAL PARTNERS,
L.P., a Delaware limited partnership;
BENCHMARK CAPITAL
MANAGEMENT CO. LLC, a Delaware
limited liability company; SANDEEP
SOOD, an individual; MONSOON
ENTERPRISES, INC., a California
corporation, and DOES 1–50, inclusive;

Counterdefendants.

1 On June 27, 2013, Defendant and Counterclaimant Raj Abhyanker ("Abhyanker") and
2 Counterdefendants filed a Joint Report Regarding Plan for Trade Secret Designation. (Pacer No.
3 98.) In the Joint Report, Abhyanker proposed a deadline of July 15, 2013 to file a motion for
4 leave to file a motion for reconsideration. *Id.* To date, the Court has not set a specific schedule
5 for the matters addressed in the Joint Report. As such, it is not clear whether Abhyanker's
6 proposed deadline of July 15, 2013 is the operative deadline for filing the motion for leave.

7 Nevertheless, in an abundance of caution, Abhyanker obtained Nextdoor.com's consent to
8 extend the previously proposed July 15, 2013 deadline to file a motion for leave. Good cause
9 exists for this consented extension because Abhyanker and Nextdoor.com are currently engaged
10 in settlement discussions and because settlement appears reasonably likely. As such, the
11 consented extension avoids unnecessary motion practice and permits the parties to further explore
12 what appears to be an imminent settlement.

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14 Dated: July 15, 2013

Respectfully submitted,

15 LEGALFORCE RAJ ABHYANKER, P.C.
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17 By /s/ Bruno W. Tarabichi

18 Bruno W. Tarabichi
19 Roy Montgomery
20 Kuscha Hatami
21 Attorneys for Raj Abhyanker
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